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October 14, 2022

Via ECF

Honorable Naomi R. Buchwald
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

**Re: Platina Bulk Carriers Pte Ltd. v. Praxis Energy Agents DMCC et al.
20-CV-04892-NRB
T&N File No.: 2838**

Dear Judge Buchwald:

We are attorneys for the Plaintiff in the above captioned action. With the consent of counsel for the Defendant, Praxis Energy Agents, LLC ("Praxis U.S."), we are writing to respectfully request a 90-day extension to the Case Management Plan.

The parties have agreed to a 30(b)(6) deposition of the Plaintiff as well as the deposition of the principal of Praxis U.S., Mr. Theodosios Kyriazis. Both parties have also agreed that, in the event they believe additional depositions are necessary, those depositions will proceed upon a showing of good cause. We've agreed to this reservation since neither party knows whether the witnesses will be in a position to respond to all the areas of inquiry. Because of both counsel's trial schedules, these depositions won't take place until the first two weeks of December. If additional depositions are necessary, we may be writing to the Court to seek the Court's assistance in determining whether good cause has been shown and the additional depositions warranted.

We appreciate the Court's indulgence in this regard.


Application granted. The deadlines set forth in the Third Revised Civil Case Management Plan and Scheduling Order dated June 22, 2022, are extended by 90 days. Fact discovery shall be completed no later than January 12, 2023. Expert discovery shall be completed no later than April 20, 2023.

No further extensions will be granted.

SO ORDERED.

Respectfully yours,

Thomas L. Tisdale


NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

Dated: New York, New York
October 17, 2022